

1 GABRIEL L. GRASSO, ESQ.  
2 Nevada Bar No. 7358  
3 **GABRIEL L. GRASSO, P.C.**  
4 411 South 6<sup>th</sup> Street  
5 Las Vegas, NV 89101  
T: (702) 868-8866  
F: (702) 868-5778  
E: gabriel@grassodefense.com  
Attorney for ELKIND

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA, )  
10 Plaintiff, ) Case No.: 2:20-mj-00709-BNW-1  
11 vs. )  
12 SHEENA ELKIND, ) **STIPULATION TO CONTINUE  
13 PRELIMINARY EXAMINATION DATE  
14 (FOURTEENTH REQUEST)**  
15 Defendant. )  
\_\_\_\_\_  
16

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
United States Attorney, District of Nevada, and Edward G. Veronda Assistant United States  
18 Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel  
19 for SHEENA ELKIND, that the Preliminary Examination hearing currently scheduled for  
20 November 3<sup>rd</sup>, 2022 at 2:00 p.m., be vacated and set to a date and time convenient to this  
21 court but no sooner than sixty (60) days.

22 The Stipulation is entered into for the following reasons:  
23

24 1. The parties are currently in the final stages of pre-indictment negotiations meant  
25 to resolve this case by the filing of an Information.  
26  
27 2. Ms. ELKIND is on Pretrial Release and does not object to the continuance.  
28  
3. The parties agree to the continuance.

1           4. The additional time requested herein is not sought for purposes of delay, but  
2           merely to allow counsel for defendant sufficient time within which to be able to  
3           effectively and complete investigation of the discovery materials provided.  
4           5. Denial of this request for continuance would result in a miscarriage of justice.  
5           6. The additional time requested by this Stipulation is excludable in computing the  
6           time within which the trial herein must commence pursuant to the Speedy Trial  
7           Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors  
8           under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).  
9           7. This is the fourteenth request for a continuance of the preliminary hearing date  
10          in this case.

11          DATED this 28<sup>th</sup> day of October 2022.

13          GABRIEL L. GRASSO, P.C.  
14          Counsel for SHEENA ELKIND

15          By /s/ Gabriel L. Grasso  
16          GABRIEL L. GRASSO, ESQ.

JASON M. FRIERSON  
United States Attorney

By /s/ Edward G. Veronda  
Assistant United States Attorney

1 GABRIEL L. GRASSO, ESQ.  
2 Nevada Bar No. 7358  
3 **GABRIEL L. GRASSO, P.C.**  
4 411 South 6<sup>th</sup> Street  
5 Las Vegas, NV 89101  
T: (702) 868-8866  
F: (702) 868-5778  
E: gabriel@grassodefense.com  
5 Attorney for ELKIND

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA, )  
9 Plaintiff, ) Case No.: 2:20-mj-00709-BNW-1  
10 vs. )  
11 SHEENA ELKIND, ) **FINDINGS OF FACT, CONCLUSIONS**  
12 ) **OF LAW AND ORDER**  
13 Defendant. )  
14 \_\_\_\_\_)

15 **FINDINGS OF FACT**

16 Based on the pending Stipulation of counsel, and good cause appearing therefore,  
17 the Court finds that:

18 1. The parties are currently in the final stages of pre-indictment negotiations meant  
19 to resolve this case by the filing of an Information.  
20 2. Ms. ELKIND is on Pretrial Release and does not object to the continuance.

22 **CONCLUSIONS OF LAW**

23 The ends of justice served by granting said continuance outweigh the best interest  
24 of the public and the defendant in a speedy trial, since the failure to grant said continuance  
25 would be likely to result in a miscarriage of justice, would deny the parties herein sufficient  
26 time and the opportunity within which to be able to effectively resolve this case, taking into  
27 account the exercise of due diligence.

## ORDER

IT IS THEREFORE ORDERED that the Preliminary Examination hearing currently scheduled for November 3<sup>rd</sup>, 2022, at 2:00 p.m., be vacated and continued to January 13, 2022 at 1:00 p.m.

DATED this 2nd day of November, 2022.

Brenda Weksler  
HONORABLE BRENDA N. WEKSLER  
UNITED STATES MAGISTRATE JUDGE